

EXHIBIT B

St. John, Joseph

From: St. John, Joseph
Sent: Tuesday, February 28, 2023 5:49 PM
To: 'hlopez@islaimmigration.org'
Cc: 'apage@islaimmigration.org'
Subject: RE: Arizona v. Garland, No. 6:22-cv-1130 (W.D. La.) - SUBPOENA TO ISLA

Mr. Lopez:

Thank you for your call. You noted that you had been served with our subpoena, and we discussed that subpoena. You initially suggested the identity of ISLA's clients is privileged, and your further expressed concern with burden of responding to our subpoena.

First, as I explained, neither the existence of an attorney-client relationship nor the general subject matter of the representation is privileged.

Second, regarding request No. 1:

- (a) We are willing to narrow the scope of Request No. 1 to cover only ASYLUM APPLICANTS or asylum seekers (a) not detained but located in Florida or Louisiana, (b) who provided a residence address in in Florida or Louisiana, or (c) who provided a mailing address in Florida or Louisiana.
- (b) Alternatively, we would consider your identifying 5-10 pending asylum applicants/seekers and 5-10 asylum grantees who have non-citizen children enrolled in public school, who are on SNAP or TANF, or who are on Medicaid as fully satisfying Request No. 1. The identified individuals must be located in Louisiana or Florida, and they cannot be all Cuban or Haitian.

Third, we are more-than-willing to discuss ways to minimize any burden. Please don't hesitate to reach out if further discussions would be helpful.

Best regards,
Scott



Joseph Scott St. John

Deputy Solicitor General
Office of Attorney General Jeff Landry
Tel: (225) 485-2458
stjohnj@ag.louisiana.gov
www.AGJeffLandry.com

From: St. John, Joseph
Sent: Thursday, February 23, 2023 1:42 PM
To: 'hlopez@islaimmigration.org' <hlopez@islaimmigration.org>
Cc: 'apage@islaimmigration.org' <apage@islaimmigration.org>
Subject: Arizona v. Garland, No. 6:22-cv-1130 (W.D. La.) - SUBPOENA TO ISLA

Mr. Lopez:

Please see the attached subpoena to Immigration Services and Legal Advocacy (ISLA), for which you are the registered agent. When our process server attempted service at your registered address, he was told that you are out of town until next Wednesday. I would greatly appreciate your responding to this email and waiving formal service.

Best regards,
Scott

Cc: Allyson Page, ISLA Executive Director



Joseph Scott St. John

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